

U.S. Department of Justice

United States Attorney Eastern District of New York

JHK:DCL:MMO

610 Federal Plaza Central Islip, New York 11722

March 14, 2019

Honorable Joseph F. Bianco United States District Judge Eastern District of New York 100 Federal Plaza Central Islip, New York 11722

Re: <u>United States v. Kenner and Constantine</u>

No. CR-13-607 (S-2) (JFB)

Dear Judge Bianco:

This letter is submitted to advise the Court that, pursuant to the Court's directive on March 1, 2019, the government met with counsel for the third parties on March 13, 2019 to address their concerns regarding certain language in the proposed preliminary order of forfeiture.

At the conclusion of the meeting, the government and counsel agreed that additional time is necessary to continue the discussion. Accordingly, the government respectfully requests permission to file a letter on or before April 5, 2019, to advise the Court of the progress of its discussions with third party counsel.

Thank you for Your Honor's consideration of this submission.

Respectfully submitted,

RICHARD P. DONOGHUE United States Attorney

By: /s/ Madeline O'Connor Madeline O'Connor Diane C. Leonardo Assistant U.S. Attorneys (631) 715-7870 (631) 715-7854

cc: Sam Talkin, Esq. (by ECF)
Jesse Siegel, Esq. (by ECF)
Philip Kenner (by mail)
Thomas McC. Souther, Esq. (by email)
Kevin P. Mulry, Esq. (by email)
Marc Wolinsky, Esq. (by email)
Doreen Martin, Esq. (by email)
Kelly Weiner, Esq. (by email)
George Kostolampros, Esq. (by email)